

Human Rights Policy



| | |
|----------------------------|--|
| Document Title | Human Rights Policy |
| Document Ref | SM/SEC/POL/002 |
| ISO Standard | ISO 9001:2015 / ISO 18788:2015 / ISO 28007:2015 / ISO 28000:2022 / ISO 45001:2018 |
| Version | 1.0 |
| Classification | Internal |
| Effective Date | 2 April 2026 |
| Review Frequency | As per Document Register defined review date, or upon significant change |
| Owner | Group Compliance Director |
| Approved By | Pavel Shparber, CEO / Darren Watts, Group Compliance Director |
| Applicable Entities | Seagull Maritime FCZO, Seagull Maritime Malta, Seagull Maritime Nigeria, Seagull Maritime UK, Seagull Offshore |

INTRODUCTION

Respect for human rights is fundamental to the operational capability and sustainability of Seagull Maritime and the communities and areas in which we operate. In our Company and across our management systems, we are committed to ensuring that people are treated with dignity and respect.

Our Human Rights Policy is guided by international human rights principles encompassed in the Universal Declaration of Human Rights, Voluntary Principles on Security and Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, the United Nations Global Compact and the United Nations Guiding Principles on Business and Human Rights.

We are committed to working with and encouraging our partners and suppliers to uphold the principles in this Policy and to adopt similar policies within their businesses.

As an active member of the International Code of Conduct Association, we endorse the principles set forth by the International Code of Conduct for Private Security Service Providers (the "Code"). The Code articulates responsibilities of private security companies under human rights and international humanitarian law to ensure the responsible provision of private security services, particularly when operating in complex environments and we acknowledge the importance of these responsibilities.

RESPECT FOR HUMAN RIGHTS

Seagull Maritime fully respects human rights. It is committed to identify, prevent, and mitigate adverse human rights impacts resulting from or caused by our business activities before or if they occur through human rights due diligence and mitigation processes.

Human Rights Policy



COMMUNITY AND STAKEHOLDER ENGAGEMENT

The Company recognizes its impact on the areas in which we operate. We are committed to engaging with stakeholders in those areas to ensure that we are listening to, learning from and considering their views as we conduct our business. Where appropriate, we are committed to engaging in dialogue with stakeholders on human rights issues related to our business. We are also committed to creating economic opportunities and fostering goodwill in the areas in which we operate.

VALUING DIVERSITY

We value the diversity of the people with whom we work and the contributions they make. We have a long-standing commitment to equal opportunity and intolerance of discrimination and harassment. We are dedicated to maintaining workplaces that are free from discrimination or harassment based on race, sex, colour, national or social origin, religion, age, disability, sexual orientation, political opinion or any other status protected by applicable law. Our basis for recruitment, hiring, placement, training, compensation and advancement at the Company is qualifications, performance, skills and experience.

Regardless of personal characteristics or status, the Company does not tolerate disrespectful or inappropriate behaviour, unfair treatment or retaliation of any kind. Harassment is unacceptable in the workplace and in any work-related circumstance outside the workplace.

These principles apply not only to Company employees but also to the business partners with whom we work.

FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

We respect our employees' right to join, form or not to join a union without fear of reprisal, intimidation, or harassment. Where employees are represented by a legally recognized union, we are committed to establishing a constructive dialogue with their freely chosen representatives. The Company is committed to bargaining in good faith with such representatives.

SAFE AND HEALTHY WORKPLACE

We aim to provide a safe and healthy workplace and comply with applicable safety and health laws, regulations, and internal requirements. We are dedicated to maintaining a productive workplace by minimizing the risk of accidents, injury, and exposure to health risks. We are committed to engaging with our employees to continually improve health and safety in our workplace, including the identification of hazards and remediation of health and safety issues.

WORKPLACE SECURITY

The Company is committed to maintaining a workplace that is free from violence, harassment, intimidation and other unsafe or disruptive conditions due to internal and external threats. Security safeguards for employees are provided as needed and will be maintained with respect for employee privacy and dignity.

Human Rights Policy



FORCED LABOUR AND HUMAN TRAFFICKING

The Company prohibits the use of all forms of forced labour, including prison labour, indentured labour, bonded labour, military labour, slave labour and any form of human trafficking.

CHILD LABOUR

We are committed to not employing child labour as defined by ILO Conventions 182 (worst forms of child labour) and 138 (minimum age).

Our recruitment and selection process complies with National Law and International Conventions. We will not employ anyone under the basic minimum age of 18 years other than those on government approved apprenticeships, training schemes or educational projects. Any work which is likely to jeopardize children's physical, mental or moral health, safety or morals should not be done by anyone under the age of 18.

In no circumstances will any person younger than 21 years of age be employed in duties that might require the use of a firearm.

Seagull Maritime will actively work to ensure that we do not cooperate or work with any organisation or business we identify as breaching child labour conventions.

WORK HOURS, WAGES AND BENEFITS

The Company compensates employees competitively compared to the industry and local economies. We operate in full compliance with applicable wage, work hours, overtime and benefits laws.

Our employees and contractors are paid fairly within agreed timeframes and receive legally mandated benefits required by local law. Any overtime is voluntary and is appropriately compensated.

Where employees reside in a country where minimum wage laws are in place, Seagull Maritime are committed to ensuring these laws are abided by.

Personnel do not work more than 48 hours per week unless it is permitted according to applicable laws, regulations and collective agreements. Specific information regarding pay and working hours is included within individual staff contracts.

GUIDANCE AND REPORTING FOR EMPLOYEES

We aim to create a workplace in which open and honest communication among all employees is valued and respected. The Company is committed to following all applicable labour and employment laws wherever we operate. If you believe that a conflict arises between the language of the policy and the laws, customs, and practices of the company or, if you have questions about this policy or if you would like to report a potential violation of this policy, you should raise those questions and concerns through existing processes, which make every effort to maintain confidentiality.

You may ask questions or report potential violations to your senior manager or the Compliance department.

Human Rights Policy



No reprisal or retaliatory action will be taken against any employee for raising concerns under this policy. The Company is committed to investigating, addressing and responding to the concerns of employees and to taking appropriate corrective action in response to any violation.

A handwritten signature in black ink, appearing to read "Darren Watts".

Darren Watts

Group Compliance Director

02/04/2026